

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

IN RE AUTOMOTIVE PARTS
ANTITRUST LITIGATION

:
:
: Master File No. 12-md-02311
: Honorable Sean F. Cox
: Mag. Judge R. Steven Whalen

THIS DOCUMENT RELATES TO:
ALL END-PAYOR ACTIONS

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:
: DECLARATION OF JENNA
: FARLEIGH IN SUPPORT OF
: END-PAYOR PLAINTIFFS'
: MOTION TO STRIKE
: FINANCIAL RECOVERY
: SERVICES, LLC'S MOTION
: FOR RECONSIDERATION OF
: THE COURT'S APRIL 28
: OPINION AND ORDER
:

**DECLARATION OF JENNA FARLEIGH IN SUPPORT OF END-PAYOR
PLAINTIFFS' MOTION TO STRIKE FINANCIAL RECOVERY
SERVICES, LLC'S MOTION FOR RECONSIERATION OF THE
COURT'S APRIL 28 OPINION AND ORDER**

I, Jenna Farleigh, hereby declare the following in accordance with the provisions of 28 U.S.C. § 1746:

1. I am a partner at the law firm of Susman Godfrey L.L.P., one of the firms serving as Co-Lead Counsel for the End-Payor Plaintiff Settlement Classes. I submit this declaration in support of End-Payor Plaintiffs' Motion to Strike Financial

Recovery Services, LLC's Motion for Reconsideration of the Court's April 28 Opinion and Order.

2. The following facts are based on my personal knowledge and knowledge acquired in my role as an attorney in this litigation. If called upon as a witness, I could and would testify competently to them.

3. Attached as Exhibit A is a true and accurate copy of FRS's opening brief to the Sixth Circuit filed on April 21, 2001.

4. Attached as Exhibit B is a true and accurate copy of 3 Newberg on Class Actions § 9:37.

5. Attached as Exhibit C is a true and accurate copy of *Taylor v. KeyCorp*, 680 F.3d 609 (6th Cir. 2012).

6. Attached as Exhibit D is a true and accurate copy of *Griggs v. Provident Consumer Discount Co.*, 459 U.S. 56 (1982).

7. I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct.

Executed this 15th day of May 2021, in Seattle, WA.

/s/ Jenna Farleigh
Jenna Farleigh

CERTIFICATE OF SERVICE

I hereby certify that on May 15, 2021, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all parties of record.

/s/ Jenna G. Farleigh
Jenna G. Farleigh
SUSMAN GODFREY L.L.P.